

Nasser U. Abujbarah (026182)
The Law Offices of Nasser U. Abujbarah
7025 E. McDowell Road, Ste. 9
Scottsdale, Arizona 85257
Office: (480) 776-6846
Fax: (480) 776-6847
Email: Nasser@nualegal.com
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF ARIZONA

In re:)	In Proceedings Under
)	
WALTER LEE SLATTERY and)	Chapter 13
JOLYN SLATTERY,)	
)	Case No.: 2:09-bk-30060-GBN
Debtors.)	
<hr/>)	DEBTORS' RESPONSE TO MOVANT'S
THE BANK OF NEW YORK MELLON,)	MOTION FOR RELIEF FROM THE
)	AUTOMATIC STAY
Movant,)	
)	Re: Real Property Located at
Vs.)	6817 W. Marco Polo Road
)	Glendale, Arizona 85308
WALTER LEE SLATTERY and)	
JOLYN SLATTERY, Debtors,)	
)	
Respondents.)	
<hr/>)	

Debtors, WALTER LEE SLATTERY and JOLYN SLATTERY, by and through undersigned counsel, hereby respond to The Bank of New York Mellon's (hereby referred to as Movant) Motion for relief from the automatic stay imposed on Debtors' real property located at 6817 W. Marco Polo Road, Glendale, Arizona 85308. Debtors offer the following factors in response to this Motion.

Debtors wish to surrender the real property described above to Movant. Debtors are beginning correspondence with Movant in order to arrange a surrender of the property.

1 RESPECTFULLY SUBMITTED this 18th day of October 2010.

2 **The Law Offices of Nasser U. Abujbarah**

3 /s/ Nasser U. Abujbarah

4 Nasser U. Abujbarah
5 The Law Offices of Nasser U. Abujbarah
6 7025 E. McDowell Road, Ste. 9
7 Phoenix, Arizona 85257
8

9 E-Filed this 18th day of
10 October 2010 with:

11 The US Bankruptcy Court

12 COPY of the foregoing
13 Mailed this 18th day of
14 October 2010 to:

15 The Office of the US Trustee
16 230 N. 1st Ave., #204
17 Phoenix, Arizona 85003

18 Russell Brown
19 Suite 800
20 3838 N. Central Ave.
21 Phoenix, Arizona

22 Jeremy T. Bergstrom
23 2200 Paseo Verde Pkwy, Ste 250
24 Henderson, NV 89052

25 By Nasser U. Abujbarah
26
27
28